

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board  
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

In re:

The Financial Oversight and Management Board  
for Puerto Rico,

as representative of

The Puerto Rico Electric Power Authority,

Debtor.

PROMESA

Title III

No. 17 BK 4780-LTS

**Court Filing Relates Only to  
PREPA and Shall Only be Filed  
in Case No. 17 BK 4780-LTS and  
Main Docket 17 BK 3283-LTS**

**APPLICATION FOR ADMISSION *PRO HAC VICE***

**TO THE HONORABLE COURT:**

**COMES NOW**, Mark H. Russell, applicant herein and respectfully states:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("**COFINA**") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("**HTA**") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("**ERS**") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("**PREPA**") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("**PBA**") (Bankruptcy Case No. 19 BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

1. Applicant is an attorney with the law firm Kramer Levin Naftalis & Frankel LLP with offices at 2000 K Street NW, Washington, D.C. telephone no. (202) 775-4500, fax no. (202) 775-4510, and e-mail: [mrussell@kramerlevin.com](mailto:mrussell@kramerlevin.com).

2. Applicant will sign all pleadings with the name Mark. H. Russell.

3. Applicant has been retained as a member of the above-named firm by the Ad Hoc Group of PREPA Bondholders to provide legal representation in connection with the above-styled matter now pending before the United States District Court, District of Puerto Rico.

4. Since December 18, 2020, applicant has been and presently is a member in good standing of the bar of Maryland, and since February 6, 2023, applicant has been and presently is a member in good standing of the bar of the District of Columbia, where applicant regularly practices law. Applicant's District of Columbia bar license number is 90009722.

5. Applicant has been admitted to practice before the following federal courts: U.S. Court of Appeals, Third Circuit (2022); U.S. Court of Appeals, District of Columbia Circuit (2022).

6. Applicant is a member in good standing of the bars of the court listed in paragraph 5.

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

9. During the past three years, applicant has not filed for *pro hac vice* admission in the United States District Court of Puerto Rico.

10. Local counsel of record associated with applicant in this matter is: Linette Figueroa Torres of Toro Colón Mullet P.S.C., P.O. Box 195383, San Juan, Puerto Rico 00919-5383, telephone no. (787) 751-8999, fax no. (787) 763-7760, and email: [ltf@tcm.law](mailto:ltf@tcm.law).

11. Applicant has read the Local Rules of this Court and will comply with the same.

12. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Accordingly, payment of the *pro hac vice* admission fee is being made herewith.

**WHEREFORE**, applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above styled case only.

In San Juan, Puerto Rico, this 8th day of May of 2023.

**RESPECTFULLY SUBMITTED**

/s/ Mark H. Russell  
**MARK H. RUSSELL**

**KRAMER LEVIN NAFTALIS  
& FRANKEL LLP**  
2000 K Street NW, 4<sup>th</sup> Floor  
Washington, D.C. 20006  
Tel.: (202) 775-4500  
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Email: [mrussell@kramerlevin.com](mailto:mrussell@kramerlevin.com)

**I HEREBY CERTIFY**, pursuant to Local Rule 83A(f), that I consent to the designation of local counsel of record for all purposes.

In San Juan, Puerto Rico, this 8th day of May of 2023.

**RESPECTFULLY SUBMITTED.**

/s/ Linette Figueroa-Torres  
**LINETTE FIGUEROA-**  
**TORRES** USDC-PR No.  
227,104

***TORO COLÓN MULLET P.S.C.***  
P.O. Box 195383  
San Juan, Puerto Rico 00919-5383  
Tel.: (787) 751-8999  
Fax: (787) 763-7760

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 8th day of May 2023, I electronically filed the forgoing document with the Clerk of Court by using the CM/ECF system, and a copy of the foregoing pleading has been electronically mailed to all attorneys of record.

In San Juan, Puerto Rico, this 8th day of May of 2023.

**RESPECTFULLY SUBMITTED.**

/s/ Linette Figueroa-Torres  
**LINETTE FIGUEROA-**  
**TORRES** USDC-PR No.  
227,104

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**ORDER**

The Court, having considered the above Application for Admission *Pro Hac Vice*, orders that:

☐ the application be granted. The Clerk of Court shall deposit the admission fee to the account of Non-Appropriated Funds of this Court.

☐ the application is denied. The Clerk of Court shall return the admission fee to the applicant.

**SO ORDERED.**

In San Juan, Puerto Rico, this \_\_\_\_ day of \_\_\_\_\_, 2023.

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U.S. District Judge